

DEPARTMENT OF WATER RESOURCES

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**VIA EMAIL**

September 25, 2026

Tim Busch
Woodland-Davis Clean Water Agency
855 County Road 102
Woodland, CA 95776
Tim.Busch@cityofwoodland.gov

Subject: State Clearinghouse #2006042175, Woodland-Davis Clean Water Agency
Long-Term Water Transfer Project Supplemental Environmental Impact Report

Dear Mr. Busch,

The Department of Water Resources (Department) has reviewed the Draft Supplemental Environmental Impact Report (Draft SEIR) prepared by the Woodland-Davis Clean Water Agency (WDCWA) in September of 2026 and has the following comments.

Project Description

The WDCWA prepared a Draft SEIR to the 2007 Davis-Woodland Water Supply Project Final Environmental Impact Report (FEIR). The FEIR evaluated potential environmental impacts of constructing and operating a treated surface water supply project proposed by the City of Davis, the City of Woodland, and University of California Davis. The Draft SEIR is evaluating potential environmental consequences/impacts of Long-Term Water Transfer Project (LTWT) to increase the reliability of water supplies from the Sacramento River through long-term transfer agreements with the South Sutter Water District, Te Velde Farms, The Nature Conservancy, and/or a Sacramento River Settlement Contractor (SRSC) to help meet water demands of the cities of Woodland and Davis and the University of California, Davis during dry-year conditions, periods of Term 91 curtailments, Shasta Critical Year conditions, and other scenarios.

The proposed transfer water would be available through an individual Seller's water rights or an SRSC's existing entitlement under its settlement contract with the U.S. Bureau of Reclamation. Under the LTWT for an initial term of 25 years, transferred surface water would be diverted at WDCWA's existing Sacramento River intake facility, known as the Joint Intake Facility, and conveyed through the existing raw water pipeline to the Regional Water Treatment Facility treatment and distribution to the cities of Woodland and Davis and UC Davis for municipal and irrigation uses.

General Comments

The Draft SEIR evaluated the potential environmental impacts of the proposed LTWT including hydrology, water quality and aquatic biological resources. The Draft SEIR concluded that the LTWT will not result in any significant and unavoidable impacts. However, in its current form, the Draft SEIR does not provide sufficient information to reach this conclusion. To evaluate these potential impacts, the SEIR must provide clear and thorough description of the proposed transfer actions, including but not limited to:

- A clear and comprehensive description of potential seller agencies involved and their water rights, such as water rights permit/licenses, and the points of diversion required to move water between the seller and buyer.
- A clear description of the transfer type, maximum allowable transfer water volume to be made available by each seller and how that volume was determined. Maximum transfer volumes for each seller should describe how much is allowed under each transfer type, and what time frame the action would approximately take place.
- An Environmental Setting that includes and evaluates the project at the hydrologic region and groundwater basin scale, in addition to the seller service area.
- The use of the best available data and best management practices to estimate and address challenges related to transfer impacts, such as streamflow depletion, land subsidence, Delta water quality, and wildlife habitat.

Failure to provide the information necessary for the public, decisionmakers, and other governmental agencies to be informed of all potential environmental impacts means the Draft SEIR fails to comply with CEQA requirements. The absence of this information means the Draft SEIR is inadequate, incomplete, and lacks full disclosure.

Due to the failure to provide the information necessary to properly analyze all potential environmental impacts, the Draft SEIR must be updated with the relevant information and recirculated for another public review period.

For further information regarding the details needed to assess water transfer impacts, the Department suggests referencing the Draft Technical Information for Preparing Water Transfer Proposals¹, and/or the 2026-2027 North to South Water Transfers Environmental Assessment/Initial Study².

¹ Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/State-Water-Project/Management/Water-Transfers/Files/Draft_2019WTWhitePaper-012324.pdf

² Available at: https://www.usbr.gov/mp/nepa/nepa_project_details.php?Project_ID=56209

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The Department appreciates the opportunity to comment on the proposed project. If you have any questions or need additional information, please contact SWP staff at SWPWaterTransfers@water.ca.gov.

Sincerely,



Andy Chu, Supervising Engineer
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cc:

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